

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI,  
MARY BLY, MICHAEL CONNELLY,  
SYLVIA DAY, JONATHAN FRANZEN,  
JOHN GRISHAM, ELIN HILDERBRAND,  
CHRISTINA BAKER KLINE, MAYA  
SHANBHAG LANG, VICTOR LAVALLE,  
GEORGE R.R. MARTIN, JODI PICOULT,  
DOUGLAS PRESTON, ROXANA  
ROBINSON, GEORGE SAUNDERS, SCOTT  
TUROW, and RACHEL VAIL, individually  
and on behalf of others similarly situated,

Plaintiffs,

v.

OPEN AI INC., OPENAI OPCO LLC,  
OPENAI GP LLC, OPENAI, LLC, OPENAI  
GLOBAL LLC, OAI CORPORATION LLC,  
OPENAI HOLDINGS LLC, OPENAI  
STARTUP FUND I LP, OPENAI STARTUP  
FUND GP I LLC, OPENAI STARTUP FUND  
MANAGEMENT LLC, and MICROSOFT  
CORPORATION,

Defendants.

JONATHAN ALTER, KAI BIRD, TAYLOR  
BRANCH, RICH COHEN, EUGENE  
LINDEN, DANIEL OKRENT, JULIAN  
SANCTON, HAMPTON SIDES, STACY  
SCHIFF, JAMES SHAPIRO, JIA  
TOLENTINO, and SIMON WINCHESTER,  
on behalf of themselves and all others  
similarly situated,

Plaintiffs,

v.

OPENAI, INC., OPENAI OPCO LLC,  
OPENAI GP, LLC, OPENAI GLOBAL LLC,  
OAI CORPORATION, LLC, OPENAI  
HOLDINGS, LLC, OPENAI STARTUP  
FUND I LP, OPENAI STARTUP FUND GP I  
LLC, OPENAI STARTUP FUND

Consolidated Cases:

Case No. 1:23-cv-08292-SHS

Case No. 1:23-cv-10211-SHS

Case No. 1:24-cv-00084-SHS

**AFFIDAVIT OF KIRSTIN STOLL-  
DEBELL IN SUPPORT OF MOTION  
FOR ADMISSION *PRO HAC VICE***

MANAGEMENT LLC, and MICROSOFT CORPORATION,

Defendants.

NICHOLAS A. BASBANES and NICHOLAS NGAGOYEANES (professionally known as Nicholas Gage), individually and on behalf of all others similarly situated,

Plaintiffs,

V.

MICROSOFT CORPORATION, OPENAI, INC., OPENAI GP, L.L.C., OPENAI HOLDINGS, LLC, OAI CORPORATION, LLC, OPENAI GLOBAL, LLC, OPENAI, L.L.C., and OPENAI OPCO, LLC,

Defendants.

STATE OF COLORADO )  
 ) ss:  
COUNTY OF DENVER )

Kirstin Stoll-DeBell, of full age, being duly sworn, hereby deposes and says as follows:

1. I am a Partner with the law firm of Faegre Drinker Biddle & Reath LLP, attorneys for defendant Microsoft Corporation in the above-captioned action.
2. I am admitted to practice in the highest court of the State of Colorado and the highest court of the State of Arizona. I am a member in good standing of the highest court of the State of Colorado and highest court of the State of Arizona. Annexed hereto as Exhibit A is a Certificate of Good Standing from the Supreme Court of Colorado, dated June 17, 2024. Annexed hereto as Exhibit B is a Certificate of Good Standing from the Supreme Court of Arizona, dated June 18, 2024.
3. I have never been convicted of a felony.

4. I have never been censured, suspended, disbarred or denied admission or readmission by any court.

5. There are no pending disciplinary proceedings against me in any state or federal court.

*Kirstin Stoll-DeBell*

Kirstin Stoll-DeBell

Sworn and subscribed to before  
me this 8th day of July, 2024

*Robin L. Rold*  
Notary Public

